

**EXHIBIT A**

**PROPOSED ORDER**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 24-CV-22523-MOORE/Elfenbein

**KENNY ORTEGA,**

Plaintiff,

v.

**MIAMI-DADE COUNTY, et al.,**

Defendants.

\_\_\_\_\_ /

**ORDER FOLLOWING DISCOVERY HEARING**

**THIS CAUSE** came before the Court for a hearing on July 22, 2025, on Defendant Miami-Dade County's Motion to Compel Plaintiff's Deposition Dates and Computation of Damages. Having carefully considered all pertinent portions of the record and argument of counsel, it is hereby **ORDERED AND ADJUDGED** as follows:

1. Defendant Miami-Dade County's Motion to Compel Plaintiff's Deposition Dates is **GRANTED** as set forth herein. Within three (3) days from the date of this Order, Plaintiff shall confirm in writing to defense counsel his availability for an in-person deposition to take place on one of the following dates: August 5, 7, 11, 12, or 19.

2. Defendant Miami-Dade County's Motion to Compel Plaintiff's Computation of Damages is **GRANTED** as set forth herein. Within three (3) days from the date of this Order, Plaintiff shall serve Amended Initial Disclosures that provide a computation for each category of economic and non-economic damages. Plaintiff's failure to provide a calculation as to non-

economic damages precludes Plaintiff from suggesting any amount of non-economic damages to the jury at any point or manner during trial.

3. Failure to comply with this Order may result in sanctions including attorney's fees.

**DONE AND ORDERED** in Chambers in Miami, Florida, on \_\_\_\_\_, 2025.

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**MARTY FULGUEIRA ELFENBEIN**  
**UNITED STATES MAGISTRATE JUDGE**

cc: All counsel of record